

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

MADELEINE BARLOW, an individual,

Plaintiff,

v.

STATE OF WASHINGTON d/b/a  
Washington State University,

Defendant.

NO. 3:20-cv-05186

**ORDER GRANTING JOINT  
MOTION FOR PROTECTIVE  
ORDER**

THIS MATTER coming on for hearing on the joint motion for protective order, Defendant appearing by and through its attorneys, ROBERT W. FERGUSON, Attorney General, and BRIAN J. BAKER, Assistant Attorney General, and Plaintiff MADELEINE BARLOW, appearing by and through her counsel, AMANDA SEARLE and MEAGHAN DRISCOLL, and the court having considered the records and files herein, including:

1. Parties' Joint Motion for Protective Order;
2. Declaration of Brian J. Baker in Support of Defendant's Motion for Protective

Order;

and being fully advised; now, therefore,

IT IS HEREBY ORDERED that

1           1.       Defendant WSU will produce the disciplinary records of Thomas Culhane, in a  
2 manner that comports with the requirements of the Family and Educational Rights and Privacy Act  
3 of 1974 ("FERPA") within 30 days of the date of this order, unless an extension is agreed to by the  
4 parties.

5           2.       Defendant WSU will produce other documents and responses to requested  
6 discovery that are subject to FERPA, to the extent that such information is otherwise discoverable  
7 under applicable Federal Rules of Civil Procedure and attendant caselaw.

8           DONE IN OPEN COURT this 28th day of July, 2020.

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BENJAMIN H. SETTLE  
United States District Judge

Presented by:

ROBERT W. FERGUSON  
Attorney General

*/s/Brian J. Baker*

BRIAN J. BAKER, WSBA No. 54491  
Assistant Attorney General  
Attorney for Defendant State

Approved as to form:

*/s/Meagan Driscoll*

AMANDA SEARLE, WSBA No. 43632  
MEAGHAN DRISCOLL, WBSA No. 49863  
Attorneys for Plaintiff